

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN THE MATTER OF:**

**BORA BORA, INC.  
aka PUERTO ESCONDIDO; aka BORA BORA; aka  
DROP OUT; aka THE METHOD**

**Debtor**

**CASE NO. 09-03693 (ESL)**

**CHAPTER 11**

**DEBTOR'S OBJECTION TO DIANA UMPIERRE'S CLAIM (CLAIM NO. 18)**

**TO THE HONORABLE COURT:**

COMES NOW, Bora Bora Inc. as Debtor and Debtor in Possession for the above-captioned case (hereinafter referred to as Debtor), and through the undersigned attorneys and STATES and PRAYS:

1. This Court after a hearing on March 2, 2010 approved Debtor's Disclosure Statement.  
(See Order of March 5, 2010, *approving* Debtor's Disclosure Statement).
2. This Court scheduled a hearing on whether to confirm the Plan of Reorganization for June 7, 2010 at 9:30 am.
3. Pursuant to Debtor's approved Disclosure Statement, the Debtor has until 30 days after the Confirmation of the Plan to object to proofs of claim.
4. The Debtor hereby objects to Diana Umpierre's claim because of its failure to contain a supporting document which evinces an obligation from the Debtor to the Claimant in accordance with Federal Bankruptcy Rules of Procedure (*See Bankr.R.Pro. 3001 et seq.*).
5. The documents attached to Ms. Umpierre's claim do not show an obligation from Debtor to Ms. Umpierre.
6. On the contrary, Debtor has documents demonstrating that Ms. Umpierre and her former

spouse have an obligation to the Debtor.

6. Accordingly, the Debtor objects to Ms. Umpierre's claim and requests that her claim, Claim No. 18, be denied.

WHEREFORE, the Debtor respectfully requests that Ms. Umpierre's claim against the Debtor, Claim No. 18, be denied.

**NOTICE TO CLAIMANT PURSUANT TO LOCAL RULE 3007-1**

Within thirty (30) days after service is evidenced by the certification, and an additional three (3) days pursuant to Fed.R.Bankr.P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice requires otherwise. If you file a timely response, the court may – in its discretion – schedule a hearing.

**RESPECTFULLY SUBMITTED,**

In San Juan, Puerto Rico this 21<sup>st</sup> Day of May 2010.

**I HEREBY CERTIFY** that on this same date I electronically filed the foregoing through the CM/ECF system, which will send notification of such filing to the U.S. Trustee, counsel for Ms. Umpierre, and to all other parties therein registered to receive Notice as listed below.

**C. CONDE & ASSOC.**

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